

# INTERVENTION



0000097112

ORIGINAL

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION

IN THE MATTER OF THE APPLICATION OF UNS  
ELECTRIC, INC., IN CONFORMANCE WITH THE  
REQUIREMENTS OF ARIZONA REVISED STATUTES  
§§ 40-360 *et seq.*, FOR A CERTIFICATE OF  
ENVIRONMENTAL FOR A ENVIRONMENTAL  
COMPATIBILITY FOR THE VAIL TO VALENCIA 115 KV  
TO 138 KV TRANSMISSION LINE UPGRADE PROJECT,  
ORIGINATING AT THE EXISTING VAIL SUBSTATION IN  
SEC. 4, T.16S., R.15E., PIMA COUNTY, TO THE EXISTING  
VALENCIA SUBSTATION IN SEC. 5, T.24S., R.14E., IN THE  
CITY OF NOGALES, SANTA CRUZ COUNTY, ARIZONA

Arizona Corporation Commission

Docket No. L-00000F-09-0190-00144

Case #144

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## Notice of Filing a Motion to Intervene

By

Elizabeth Buchroeder-Webb (Elizabeth Webb)

*This amended motion to intervene supercedes any previous motion to intervene.*

As a Tucson Electric Power ratepayer, consumer, and interested party, I respectfully request to be a party in this matter. My experiences include Vail and Pima County energy issues as a civilian intervener in TEP Line Site Case 13<sup>7</sup> and City of Tucson Case SE-08-05 TEP Cienega Substation Dawn Drive RH Zone (Ward 4). I am also a community volunteer in local historic, cultural, educational, environmental issues as well as a member of the Vail Preservation Society and the Hilton Ranch Community Association. Additionally, I am a 2005-2006 graduate of Partners in Policymaking, a program designed for individuals who have a disability and for parents raising children with a disability. PiP is an innovative leadership training program that teaches people to be community leaders, and to affect systems and policy change at the local, state and national levels.

Potential issues should be prudently resolved during this hearing with appropriate conditions attached to the Certificate of Environmental Compatibility, should it be issued by the committee. The key issue is the continuing impact to the natural, historic and human environment within the approximately 425 square miles of the Vail School District boundaries- an area also encompassed within the identified boundaries of the Vail Preservation Society.

I respectfully ask **not to be combined** with any other interveners in this case as my area of interest is predominately within Segment 1A and a smidge south of there within Pima County.

Arizona Corporation Commission  
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The following are concerns in this case:


1. Repetitive impacts to the natural, cultural and human environments of one county or geographic location in Arizona for the benefit(s) of different counties/geographic locations and/or corporations within and outside of Arizona- particularly in rural areas.
2. Outreach and involvement with non-governmental organizations (NGOs) or potential individual interveners within the total environment of the project.
3. Impacts of "weathered" core ten compared to less visible galvanized steel poles on view sheds within the project.
4. Environmental impacts of new transmission line routes and associated access roads moving from the Nogales tap to the Vail Substation vs. upgrading the existing transmission line and tap in Segment 1-A.
5. Potential of this project to have any association with a planned transmission line to the proposed Rosemont Copper Mine.

If this motion is approved, I request a discovery period through 30 July 2009, due to the short time between date of my motion to intervene and the hearings and should any pertinent information come to light during the evidentiary hearing. If the applicant denies any discovery data request, that response requires rapid adjudication. Such denied response needs to include the Committee Chairman as an addressee so any dispute can be promptly resolved. I plan to dispute any data request denial to the Committee Chairman within 3 business days. Ten calendar days for data request responses is expected and appreciated.

This filing has been mailed to all parties in the service list below.

Dated this 18<sup>th</sup> day of May 2009

ELIZABETH BUCHROEDER-WEBB

By  \_\_\_\_\_

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Pursuant to AAC R14-3-204

Original and 25 copies of the foregoing are filed this date with:

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